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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91211530
Party	Plaintiff J-Lynn Entertainment, LLC
Correspondence Address	NEADOM T MEDINA J LYNN ENTERTAINMENT LLC PO BOX 12365 Mill Creek, WA 98012 UNITED STATES tamar@j-lynnentertainment.com
Submission	Motion to Compel Discovery
Filer's Name	Neadom T Medina
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Date	05/12/2014
Attachments	Mo- tion_to_Compel_Second_Written_Discovery_Request_Opposition_91211530.pdf(73193 bytes)

COMES NOW Opposer J-Lynn Entertainment LLC requesting from the Trademark Trial and Appeals Board a Motion to Compel the Opposer's second request for a written discovery (Fig 2) served on July 30th 2013 to Applicant William T. Odonnell (Applicant) and through counsel, The Trademark Company, PLLC a request that the Applicant failed to provide even after a 30 day extension (see Fig 1 below). This request was originally given after the Opposer discovered materials in the first written discovery request served on June 18th 2013 were altered and omitted by the applicant and most of the responses such as sales receipts, customer orders, and distributor orders were not supplied or refused.

Fig 1

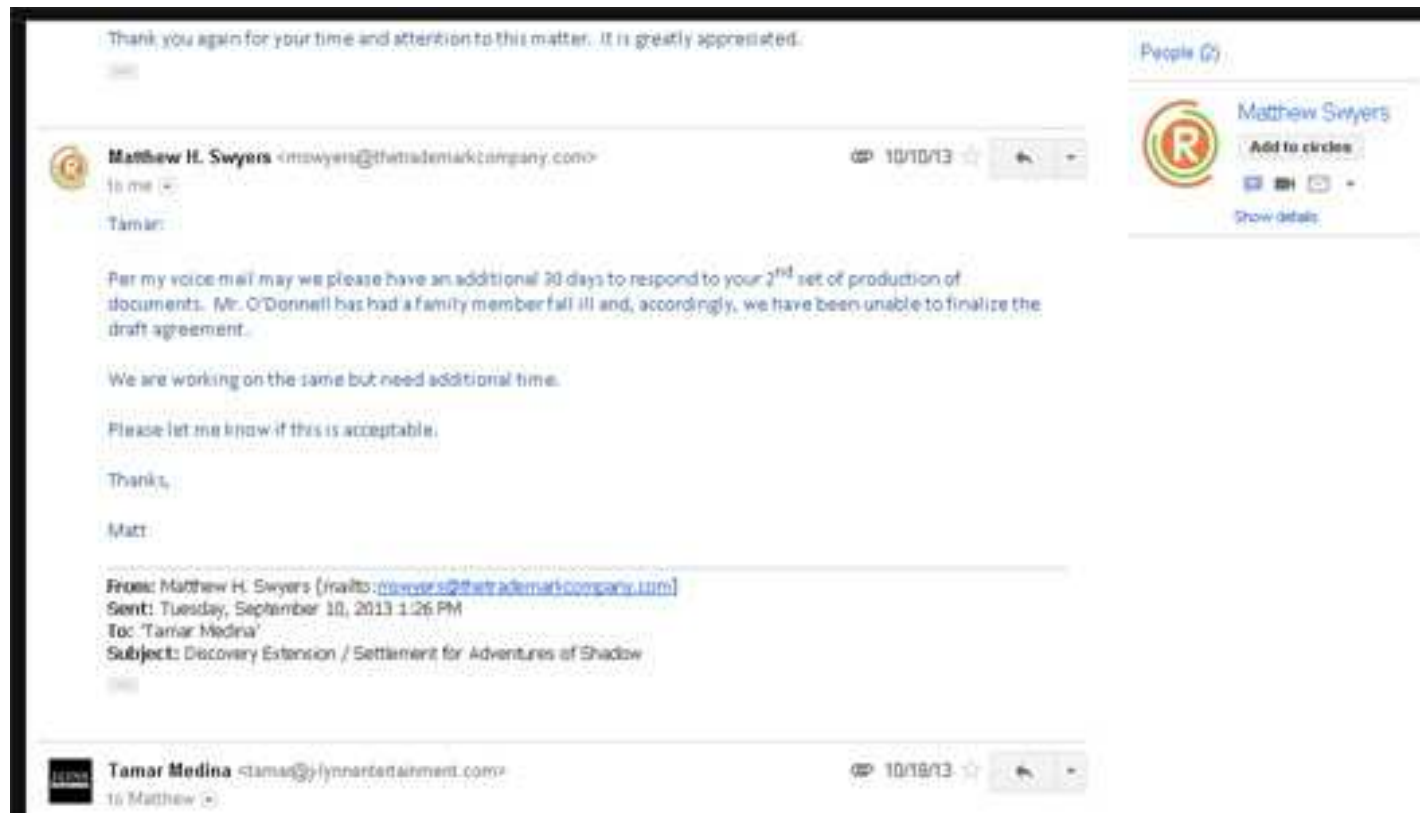


Fig 2
REQUEST FOR WRITTEN DISCOVERY

This is a formal request for a Written Discovery requesting supplementation to responses from the previous Written Discovery. It has been discovered that materials related to the water bottle and possible other materials have been altered and omitted in the previous requested Written Discovery. This request is for the Registrant to provide unaltered documents and additional documents and information prior to the claim of first use date of August 29th 2007 to the date the cancellation proceeding was filed. These documents include and are not limited to the document requests listed below for cancellation proceeding of "Adventures of Shadow" Cancellation No. 92056491, and related Opposition proceeding, Opposition No. 91211530 . Documents requested our listed below:

The written request includes:

1. Requests of the actual original physical water bottles that have the original physical "Limited Edition 2008" label on them. Not an exported jpeg image that could have been modified at anytime or new bottles produced after the cancellation proceeding has been filed or when the first request for a Written Discovery was sent.
2. Request for names, contact information, and addresses of all the organizations or individuals that own property where the flyers from page 176 from the first Written Discovery were posted or advertised, and indication relationship to the registrant, for example; indication if these individuals are relatives or family friends of the registrant.
3. Request for names, addresses, and contact information on the manufacturer and merchant for the shirt the registrant is wearing in the picture of him in front of the light house. This is the top picture on page 234 of the first Written Discovery.
4. Request for names, addresses, and contact information on the manufacturer and merchant for the black shirt with a generic dog picture and the worlds "Shadow" the registrant is wearing in the pictures posted on his "Adventures of Shadow" Facebook page that were posted on July 24th 2013.
5. Request for names, addresses, and contact information on the manufacturer and merchant for the white shirt with generic dog picture the registrant is wearing in the pictures posted on his "Adventures of Shadow" Facebook page that were posted on July 30th 2013.
6. Request for a list of all the names and contact information of individuals, websites, publishers, and companies that the registrant contacted or harassed claiming they were stealing his trademark and/or gave legal threats to. This request also includes copies of all the email communication to these entities and posts on their sites to these entities. This request also includes the dates of any phone calls or voice mails left to these entities. This request also includes a list of the grounds and products of the registrant that he claimed they were damaging. The registrant included some email's in the initial discovery material, but on the email he to sent me on 10/3/2012 or page 177 seemed to indicate there was more people. One particular individual was a Christian author the registrant claimed was using the reverse of his trademark called "Shadow Adventure Series" which the registrant scared them into changing the name and reprinting all their covers and pages. It is not clear if Mavis Duke Hinton on page 35 is the author the registrant is referring to in the email.

7. Documentation and evidence that supports why the registrant believes he has exclusive rights and a monopoly for the word "Shadow" even though other trademarks and copyrights over the last eight decades have used the word "Shadow" in respect to animals, people, and products.
8. Documentation and evidence that supports why the registrant believes he has exclusive rights and a monopoly for the word "Adventures" even though other trademarks and copyrights over the last eight decades have used the word "Adventures" in respect to animals, people, and products.
9. Request for information purposely omitted from the first discovery and has not been created after the cancellation proceeding was filed for his registration in water bottles; IC 032. US 045 046 048. G & S: Purified bottled drinking water. For Films; IC 009. US 021 023 026 036 038. G & S: Motion picture films. C 016. US 002 005 022 023 029 037 038 050. G & S: Series of fiction books and paper based products. This also includes other related product types in these categories that Mr. Odonnell claims to have been selling since 8-29-2007.
10. Sales receipts for the photos and calendars ordered from Costco that were ordered around Christmas and other holidays. These are the Costco orders that were supplied in first written discover by the Applicant but had all the Costco logos removed by the Applicant.

Respectfully submitted on May 12, 2014

J-Lynn Entertainment, LLC
/Neadom T Medina/
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Petitioner

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

Registration No. 3682041

For the mark ADVENTURES OF SHADOW,

J-Lynn Entertainment, LLC,

Petitioner,

vs.

William T. Odonnell,

Registrant.

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Cancellation No. 92056491
Opposition No. 91211530

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I respectfully submitted a copy on this May 12, 2014, to the Trademark Trial and Appeal Board and to be served, via first class mail, postage prepaid, upon:

Matthew H. Swyers
The Trademark Company
344 Maple Avenue West, PMB 151
Vienna, VA 22180

/Neadom T Medina/
Neadom T Medina

Member
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